

JUL 26 2018

**PETER A. MOORE, JR., CLERK
US DISTRICT COURT, EDNC**

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
No. 5:17-CV-114-BO

ROSITA SABROSSO-RENNICK,
Plaintiff,

V.

NORTH CAROLINA
STATE TREASURER,
Defendant.

**REPORT OF THE PARTIES'
PLANNING MEETING**
Fed. R. Civ. P. 26(f)

REPORT OF THE PLAINTIFF'S PLANNING MEETING

PRELIMINARY STATEMENT

Plaintiff and the Defendant agreed to all terms, with the exception of 3F. Plaintiff requested that Defendant's Counsel include that Plaintiff would like the deposition time to be in accordance with FRCP 30(d)(2). Defendant's counsel refused to add the language, characterizing the requests as argumentative. Accordingly, he filed the planning meeting on behalf of the Defendant, causing Plaintiff to have to file her own statement and having to incur cost to overnight this report. Exhibit A

1. The following persons participated in a Rule 26(f) conference on July 11, 2018 by teleconference:

Plaintiff, Rosita Sabrosso-Rennick, representing herself.

Joseph A. Newsome, Special Deputy Attorney General, representing the Defendant,
North Carolina State Treasurer.

2. Initial Disclosures. The parties will complete by August 17, 2018 the initial disclosures

required by Rule 26(a)(1).

3. Discovery Plan. The parties propose this discovery plan:

- (a) Discovery will be needed on these subjects: Plaintiff's Title VII retaliation claim, Defendant's employment practices and policies, and Defendant's electronic communications related to the Plaintiff from 1 month prior to her report to Human Resources until the end of her employment with Defendant.
- (b) The discovery period will begin on the date of the Court's Scheduling Order. All discovery will be served in order to allow answers to the discovery requests to be served by the completion of the discovery period on February 28, 2019.
- (c) The maximum number of interrogatories by each party to another party will be 30, and answers will be due 30 days after service of the interrogatories.
- (d) The maximum number of requests for admission will be 30, and the responses will be due 30 days after service of the requests.
- (e) The maximum number of depositions by each party will be 6.
- (f) Plaintiff requested that the timeline for depositions be in accordance with FRCP 30(d)(2), which provides 7 hours of 1 day. Defendant's counsel requested 4 hours.
- (g) The deadline for exchanging reports of expert witnesses will be December 31, 2018.
- (h) Supplementations under Rule 26(e) will be due 30 days before the date for trial.
- (i) No issues about disclosure, discovery, or preservation of electronically stored information, including the form or forms in which it should be produced, are anticipated.
- (j) No issues about claims of privilege or of protection as trial-preparation materials,

including—if the parties agree on a procedure to assert these claims after production—whether to ask the court to include their agreement in an order under Federal Rule of Evidence 502, are anticipated.

4. Other Items:

- (a) The parties do not request a meeting with the court before a scheduling order is issued.
- (b) The parties request a pretrial conference at least two weeks prior to the date for trial.
- (c) Plaintiff shall seek to amend pleadings or join additional parties no later than January 15, 2019.
- (d) The defendant shall seek to amend pleadings or to join parties no later than January 31, 2019.
- (e) The final date to file dispositive motions shall be March 30, 2019.
- (f) The parties believe there might be an opportunity to settle the case.
- (g) Although the case is not required to be mediated pursuant to Local Civil Rule 101.1a (b), the parties agree that mediation might enhance the settlement prospects of the case. If mediation occurs, it must happen by February 28, 2019. The mediator must be a North Carolina certified mediator. The parties agree to select a mediator by September 30, 2018.
- (h) The final date for submitting Rule 26(a)(3) witness lists, designations of witnesses whose testimony will be presented by deposition, and exhibit lists is 30 days before trial.
- (i) The final date to file objections under Rule 26(a)(3) is 16 days before trial.

- (j) The parties request that the court rule on any motions for summary judgment prior to any trial setting. The parties would request that the court set the trial date no earlier than 60 days after a ruling on any motions for summary judgment.

07-25-2018
Date: _____



Rosita Sabrosso-Rennick, Plaintiff
3802 Delverne Road
Baltimore, Maryland 21218
rositarennick@yahoo.com
443-240-3260

CERTIFICATE OF SERVICE

I hereby certify that on July 25, 2018, a copy of Plaintiff's Planning Meeting was mailed to the Defendant's Counsel by first class mail postage prepaid to:

Joseph Newsome, Esquire
114 W. Edenton St
Raleigh, NC 27603
Counsel for Defendant



Rosita Sabrosso-Rennick, Plaintiff